

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

DANA JENNINGS and JOSEPH A.
FURLONG, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

CARVANA, LLC,

Defendant.

Case No. 5:21-cv-05400

Hon. Edward G. Smith

**DECLARATION OF ROBERT C. COLLINS III IN SUPPORT OF DEFENDANT
CARVANA, LLC'S MOTION TO COMPEL ARBITRATION AND TO DISMISS**

I, Robert C. Collins III, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney licensed to practice in the State of Illinois and am admitted *pro hac vice* in this Court. I am a partner at the law firm of Latham & Watkins LLP, attorneys of record for Carvana, LLC ("Carvana"). I am over the age of 18 years of age. The facts contained in this declaration are based on my personal knowledge.

2. A true and correct copy of Plaintiff Dana Jennings' Retail Purchase Agreement, executed on January 2, 2021, is attached hereto as Exhibit A.

3. A true and correct copy of Plaintiff Dana Jennings' Arbitration Agreement, executed on January 2, 2021, is attached hereto as Exhibit B.

4. A true and correct copy of Plaintiff Joseph A. Furlong's Retail Purchase Agreement, executed on June 3, 2021, is attached hereto as Exhibit C.

5. A true and correct copy of Plaintiff Joseph A. Furlong's Arbitration Agreement, executed on June 3, 2021, is attached hereto as Exhibit D.

6. A true and correct copy of the First Amended Complaint in the matter captioned *Burden v. Carvana, LLC*, No. 200801110 (Pa. Ct. Com. Pl.), filed on August 30, 2020, is attached hereto as Exhibit E.

7. A true and correct copy of the Order in the matter captioned *Burden v. Carvana, LLC*, No. 200801110 (Pa. Ct. Com. Pl.), entered on December 4, 2020, is attached hereto as Exhibit F.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Chicago, Illinois on the 28th day of January, 2022.

/s/ Robert C. Collins III
Robert C. Collins III